



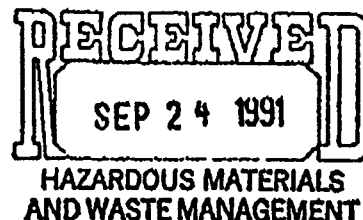
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VIII

SEP 19 1991

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405

Ref: 8HWM-FF

Mr. Gary Baughman  
Colorado Department of Health  
4210 E. 11th Ave.  
Denver, CO 80220



Re: OU 7 Final Workplan

Dear Mr. Baughman:

The plan in general is much improved from the draft version, and we are prepared to approve it. However, several issues should be clarified and/or taken into consideration during execution of the field program. Additional necessary efforts identified as work proceeds can be added to the program by amending the plan with technical memoranda.

We remain concerned about the tritium investigation wells. The final plan indicates that no information is available about abandonment of these wells. Almost nothing seems to be known about their construction. It would appear that the potential presence of 50 or more wells buried in the central portion of the landfill would pose a significant problem for closure, as they may represent conduits for migration of liquids through the fill. The program presented doesn't contain any efforts to locate or document the condition of these wells. Methods for doing this must be identified and considered for addition to the program.

The data presented indicates the liquids exiting the toe of the landfill (SW097) exhibit high levels of contamination. EPA is concerned about this release and is considering the need for an interim action to control and/or treat this flow in order to prevent further contamination of the landfill pond and areas downstream. We recommend this issue be discussed between all parties in the near future.

There appears to be some confusion surrounding how the risk assessment process and the Phase I/Phase II scheme set up in the IAG fit together. DOE must recognize that, while all field activities should be designed and conducted to support completion of a risk assessment (including an Environmental Evaluation), this Phase I effort is restricted to source definition in support of closure. The information obtained will be utilized in assessing risk from this OU, but may not be sufficient to conclude that task. Some exposure pathways will not be ready for full evaluation until after Phase II.

The extensive discussion of the contaminants of concern and


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the criteria for their selection may be premature given the scarce data available for the site. In any case the development of contaminants of concern needs to be coordinated with ongoing work within the Risk Assessment Technical Working Group, and updated as necessary to remain consistent with current thinking on these issues.

If you have any questions, please contact Bill Fraser at (303) 294-1081.

Sincerely,



Martin Hestmark  
Rocky Flats Project Manager

cc: William G. Fraser  
Louis W. Johnson